

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF TEXAS,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF LOUISIANA,  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF  
COAST, INC., PLANNED  
PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED  
PARENTHOOD SOUTH TEXAS,  
INC., PLANNED PARENTHOOD  
CAMERON COUNTY, INC.,  
PLANNED PARENTHOOD SAN  
ANTONIO, INC.,

Defendants.

Civil Action No. 2:21-CV-00022-Z

**REQUEST FOR CLERK'S ENTRY OF DEFAULT**

Pursuant to Fed. R. Civ. P. 55(a) and Local Rule 55.3, Relator and the State of Texas hereby request that the Clerk enter default against Defendants for failure to timely file an answer in this case.

Under Federal Rule of Civil Procedure 12(a)(4)(A), a defendant must serve an answer to the complaint within 14 days after notice of the Court's order denying a Rule 12 motion to dismiss. Defendants were served on January 13 and 14, 2022. Dkt. 32, 33. Defendants appeared in this case on January 28, 2022 and filed motions to dismiss under Rule 12 on February 14, 2022. Dkt. 34, 48, 50. On April 29, 2022, the Court granted Defendants' motions as to one of Relator's claims but denied them as to all other claims. Dkt. 71. The Court's order was entered on PACER on April 29, 2022 and sent the same day via ECF notice to Defendants' counsel. Dkt. 71. Under Rule 12(a)(4)(A), Defendants' answer was due 14 days later, or on May 13, 2022. Defendants have thus failed to timely file and serve an answer to the Complaint.

The Clerk should enter Defendants' default. Fed. R. Civ. P. 55(a); L.R. 55.3.

Respectfully submitted.

/s/ Andrew B. Stephens

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**VERIFICATION**

I hereby declare under penalty of perjury that the factual statements in the foregoing Request for Clerk's Entry of Default are true and correct.

Executed on May 17, 2022.

/s/ Andrew B. Stephens  
ANDREW B. STEPHENS

**CERTIFICATE OF SERVICE**

I hereby certify that on May 17, 2022, I electronically filed the foregoing document through the Court's ECF system, which automatically notifies counsel of record for each party.

/s/ Andrew B. Stephens  
ANDREW B. STEPHENS